

**EXHIBIT B**

**Fee Objection**

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**From:** Rich Ramirez  
**Sent:** Thursday, November 9, 2023 4:55 PM  
**To:** Caroline.Reckler@lw.com  
**Cc:** STIBANKRUPTCY.LWTEAM@lw.com; GABF Sorrento Team; HuttonJ@gtlaw.com; Shari.Heyen@gtlaw.com  
**Subject:** Sorrento - Objection to L&W Monthly Fee Statement

Ms. Reckler:

Pursuant to Section 1 of the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Dkt. No. 442] (the "Compensation Order"), the Official Committee of Equity Securities Holders (the "Equity Committee") hereby registers written notice of its objection (this "Objection") to the *Seventh Monthly Fee Statement of Latham & Watkins LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Bankruptcy Co-Counsel to the Debtors for the Period From September 1, 2023 through September 30, 2023* [Dkt. No. 1474] (the "Latham September Fee Statement") of Latham & Watkins LLP ("Latham").

Inclusive of the holdback amount, the Latham September Fee Statement requests a total of \$1,512,473.17 in fees and expenses.

The nature and basis of the Objection is:

First, the Equity Committee believes that the total amount of the fees and expenses charged by Latham in these Chapter 11 Cases are excessive in light of the quality of services rendered and are disproportionate to the projected recoveries in this case. For example, between September 1, 2023 through September 30, 2023 (the "Fee Period"), 686.70 hours equivalent to nearly \$900,000 in fees was expended on "Asset Dispositions" alone. During the Fee Period, however, the Debtors closed only one notable asset sale and one *de minimis* asset sale for the benefit of the Debtors' estates. In the Equity Committee's view, those solitary sales do not justify the grossly disproportionate amount of fees charged.

Second, the Equity Committee is currently conducting an investigation of all fees and expenses incurred by professionals retained by the Debtors, including any consultants or conflicts counsel retained by those Debtors' professionals (the "Fees Investigation"). The Fees Investigation is ongoing, and it is the Equity Committee's position that until the Fees Investigation is concluded, the status quo as to any future payments to the Debtors' professionals must be preserved. The Equity Committee has also received information suggesting that Latham may have participated in improper conduct in these proceedings by communicating with Liz Freeman, who has now been disclosed as Judge Jones's girlfriend, notwithstanding that Ms. Freeman had no role in these cases. The Equity Committee has been informed that Ms. Freeman was needed for consultation on "local practices and procedures," but that is why Jackson Walker LLP ("Jackson Walker") has been retained. The suggestion that Latham and Jackson Walker needed advice on "local practices and procedures" defies credulity, and the Equity Committee will be seeking discovery to confirm the operative facts.

Pursuant to Section 1.c. of the Compensation Order, notice of this Objection will be provided to all Application Recipients (as defined in the Compensation Order).

We reserve all rights.

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**Rich Ramirez**

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